

THE ROSEN LAW FIRM, P.A.

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Lead counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

P. VAN HOVE BVBA, PASCAL VAN HOVE GCV,
JOHN THOLLON, MICHAEL ZABINSKI, JEAN
DOYLE, AND MARK LAROSA, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

vs.

UNIVERSAL TRAVEL GROUP, INC.,
JIANGPING JIANG, YIZHAO ZHANG, JIANG
XIE, JIDUAN YUAN, LAWRENCE LEE, LIZONG
WANG, DAVID T. SVOBODA, AND
ACQUAVELLA, CHIARELLI, SHUSTER & CO.,
LLP, ACQUAVELLA, CHIARELLI, SHUSTER,
BERKOWER & CO., LLP, JOSEPH P.
ACQUAVELLA, SANTO CHIARELLI, SAMUEL
SHUSTER, AND MAURICE BERKOWER,

Defendants.

CASE No.: 2:11-cv-2164 (KM) (JBC)

**NOTICE OF MOTION AND MOTION FOR (I) PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT (II) A
PRELIMINARY DETERMINATION THAT CLASS
CERTIFICATION FOR SETTLEMENT PURPOSES IS
APPROPRIATE AND (III) APPROVAL OF
NOTICE AND NOTICE PLAN**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Stipulation of Settlement and Exhibits thereto, the pleadings and records on file in this action, and other such matters and argument as the Court may consider at the hearing on this motion, Lead Plaintiffs P. Van Hove BVBA, Pascal Van Hove GCV , John Thollon, Michael Zabinski, Jean Doyle, and Mark Larosa (the “Lead Plaintiffs”) move the Court, before the Honorable Judge Kevin McNulty, United States District Judge for the United States District Court, District of New Jersey, at the Martin Luther King, Jr. Federal Building and United States Courthouse, Room 03, 50 Walnut Street, Newark, NJ 07101, at a date and time to be specified by the Court, for an order: (i) granting Preliminary Approval of the Proposed Settlement (the “Settlement”); (ii) granting conditional certification of the Settlement Class; and (iii) granting approval of the Notice to the Settlement Class. The Defendants do not oppose this Motion.

Lead Plaintiffs request that the Court set a date for the Final Settlement Hearing, pursuant to Federal Rule of Civil Procedure 23(e), for a day not less than 135 days after the Court’s order granting Preliminary Approval.

Dated: July 1, 2016

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

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CERTIFICATE OF SERVICE

I, Laurence M. Rosen, hereby certify that on July 1, 2016, I filed a copy of the foregoing document via CM/ECF, which sent notification of such filing to all counsel of record.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 1, 2016

/s/ Laurence M. Rosen

Laurence M. Rosen